

## **REMARKS/ARGUMENTS**

### **Status of the Claims**

Prior to the entry of this Amendment, claims 1-46 were pending in this application. An Office Action mailed October 31, 2007 rejected all pending claims under 35 U.S.C. § 103. Claims 1, 22, and 33 have been amended. No claims have been added or canceled. Hence, after entry of this amendment, claims 1-46 remain pending for examination. Applicants respectfully request reconsideration of this application for at least the reasons presented below.

### **Amendments to the claims**

Claims 1, 22, and 33 have generally been amended to recite that "the first workflow is configured to automate the process of managing the identity profile by executing the operation defined by one or more workflow parameters." Support for this amendment can be found throughout the application, including specifically, on page 12, ll. 1-4 of the specification.

### **Rejections under 35 U.S.C. § 103**

The Office Action has rejected claims 1-2 and 4-40 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,662,365 issued to Sullivan et al. ("**Sullivan**"), in view of U.S. Patent No. 5,987,611 issued to Freund ("**Freund**"). This rejection is respectfully traversed, and it is submitted that the claims, at least as amended, are allowable over Sullivan in view of Freund.

Sullivan generally discloses a method for controlling parental control subsystems within an entertainment system. The entertainment system includes a computer interface to multiple audio and/or audiovisual devices. The method provides for a mechanism to lock the devices. (see Sullivan at Abstract). Sullivan further discloses that user profiles may be stored and each user profile includes access settings. A user may also create a new user profile or modify profiles settings for an existing user profile. The user can then access the devices based on the profile settings. (*Id.* at col. 9, ll. 26-53).

Freund generally discloses a computing environment for monitoring access to an open network. Monitoring and filtering of clients is provided by a centralized enforcement supervisor. The supervisor maintains access rules for the client-based filtering and verifies the existence and proper operation of the client-based filter application. (see Freund at Abstract).

Claim 1 and similarly claims 22 and 33, as amended, recite that "the first workflow is configured to automate the process of managing the identity profile by executing the operation defined by one or more workflow parameters." Applicants submit that neither Sullivan nor Freund teach or suggest such a feature. Applicants submit that Sullivan fails to teach or suggest the use of a workflow. Sullivan merely discloses various user profiles which include access settings to various audiovisual devices. Such user profiles are created and maintained by the user in which they belong. For example, if a user wishes to change their settings, the user can access the profile and make the change. If the user does not have the proper permissions to make the change, then an administrator can make the change on behalf of the user. Hence, Sullivan's access control mechanism operates similar to a login system on a computer, where the computer has multiple logins with varying permissions levels.

In contrast, claim 1 recites a workflow which provides automated management of identity profiles by executing operations defined by workflow parameters. Merely by way of example, an administrator could setup a workflow which includes various parameters for setting up identity profiles. The administrator could then set the workflow to execute and automatically create and/or manage a number of identity profiles. (see claim 1). Accordingly, the time and energy required to setup and manage identity profiles is greatly reduced. Whereas with Sullivan the users or an administrator is required to manually set up and manage the user profiles. Applicants further submit that Freund does not remedy the failings of Sullivan.

For at least these reasons, claim 1 is believed to be allowable over Sullivan in view of Freund. Independent claims 22 and 33 recite similar elements to some of those described above with respect to claim 1, and therefore are believed to be allowable for at least similar reasons.

Dependent claims 2, 4-21, 23-32, and 34-40 depend from claims 1, 22, and 33 and therefore are believed to be allowable over Sullivan in view of Freund at least by virtue of their dependence from allowable base claims.

The Office Action has rejected claims 3 and 41-46 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,662,365 issued to Sullivan, in view of U.S. Patent No. 5,987,611 issued to Freund, in further view of U.S. Patent No. 7,080,078 issued to Slaughter et al. ("**Slaughter**").

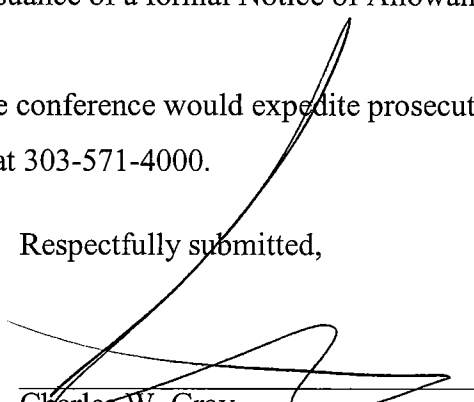
Dependent claims 3 and 41-46 depend from claims 1 and 33. As noted above claims 1 and 33 are allowable over Sullivan in view of Freund, and it is believed that Slaughter does not remedy the failings of Sullivan and Freund noted above. Hence, claims 3 and 41-46 are believed to be allowable, at least by virtue of its dependence from allowable base claims over Sullivan, Freund, and Slaughter, individually, or when combined in any combination.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



Charles W. Gray  
Reg. No. 61,345

TOWNSEND and TOWNSEND and CREW LLP  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111-3834  
Tel: 303-571-4000  
Fax: 415-576-0300  
CWG:slb  
61260553 v1